

ORIGINAL

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**FILED**  
DISTRICT COURT OF GUAM

FEB 26 2007

MARY L.M. MORAN  
CLERK OF COURT

8  
9 **IN THE UNITED STATES DISTRICT COURT**

10 **FOR THE DISTRICT OF GUAM**

11  
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 DONG PYO HONG,

16 Defendant.  
17

CRIMINAL CASE NO. 06-00058

**STIPULATED MOTION OF  
PARTIES TO CONTINUE TRIAL  
AND SET NEW DATE TO ENTER  
GUILTY PLEA**

18 The parties in the above-entitled matter, the United States of America, and the defendant,  
19 through his counsel, William L. Gavras, hereby move this Honorable Court to continue the trial  
20 of this matter, now set for March 6, 2007, at 9 :30 a.m. The parties make this motion because the  
21 defendant intends to proffer a guilty plea to the court, which plea hearing has been set for next  
22 Tuesday, February 27, 2007.

23 Government counsel will be off-island attending the Asset Forfeiture Chiefs Conference  
24 in Columbia, South Carolina, from February 27-March 1, 2007. Counsel will remain Stateside,  
25 because the Ninth Circuit has set oral argument in United States v. Duane Calvo, C.A. 06-10108,  
26 for March 12. Government counsel plans to return to Guam March 15.

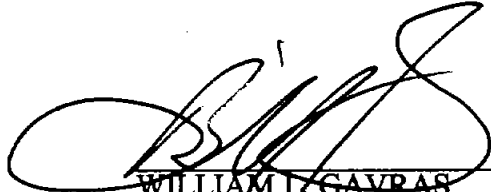
27 This guilty plea will involve certain questions and issues unique to the facts of this case,  
28 which is part of a complex scheme to obtain Guam drivers licenses fraudulently. Government

1 counsel believes it would not be appropriate to request another attorney in her office to attempt to  
2 handle it.

3 Defendant made his initial appearance on this matter January 12, 2007. The 70-day  
4 speedy trial period required by 18 U.S.C. § 3161(c)(1) will not run until March 21, 2007.  
5 Therefore, the parties believe that this case can be disposed of within the time frame required by  
6 statute.

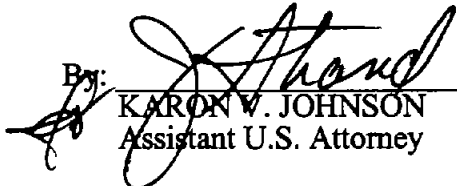
7 SO STIPULATED.

8  
9 DATE: 2-26-07

  
WILLIAM L. GAVRAS  
Federal Public Defender  
Attorney for Defendant

12 LEONARDO M. RAPADAS  
13 United States Attorney  
Districts of Guam and CNMI

14  
15 DATE: 2/26/07

16  
17 By:   
KARON W. JOHNSON  
Assistant U.S. Attorney